

review in detail over 530 entries off the extensive attorney's timesheet, provided by Plaintiffs as part of their Motion's exhibits. The analysis of said timesheet entries is still on-going as of today.

3. Also, to date Defendants have not been able to decide and narrow down on an attorney's fees expert to scrutinize and dissect Plaintiffs' attorney's fees, rates, etc. Respectable experts in the required area with good credentials and strong backgrounds are difficult to find.
4. In addition, the undersigned is currently on a family trip with his son who is on Spring break, for the latter attends a private school whose break started on April 15, 2019, during Holy week, for two weeks.
5. Therefore, as shown above, Defendants need additional time to draft and file a complete and accurate response to Plaintiffs' Motion for Attorney's fees.

II.

1. Plaintiffs filed their Motion for Attorney's fees on April 4, 2019. (Doc # 102).
2. Defendants' response is currently due Thursday, April 25, 2019.
3. Thus, Defendants respectfully ask the Court to extend their time to respond 30 days from today's date, to Friday, May 24, 2019.
4. The undersigned communicated with Plaintiffs' Counsel Aaron Johnson via both text message and telephonically on April 23, 2019, in the afternoon, explaining and discussing the above mentioned reasons for Defendants' request for additional time to respond.
5. Plaintiffs' Counsel has stated that he was "ok" with Defendants' extension of time

to respond until May 24, 2019, and that he did not oppose this Defendants' Motion to extend time.

6. This Motion is filed not so to cause undue delay, but so that justice may be done.

III.

WHEREFORE, Defendants respectfully request the Court that the stated request to extend the time to respond to Plaintiffs' Motion for Attorneys' fees to May 24, 2019, be granted herein.

Most Respectfully Submitted,

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By: /s/ Armando P. Duran

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ATTORNEY FOR DEFENDANTS,

CERTIFICATE OF CONFERENCE

I, the undersigned Counsel, hereby certify that on the 23rd day of April , 2019, I have consulted with Plaintiffs' Counsel Mr. Aaron Johnson, Esq., via both text message and telephonically, on whether or not he opposed Defendants' request to extend the time to respond to Plaintiffs' Motion and whether or not he opposed this Motion. Mr. Johnson has stated that he is ok with the new deadline to respond of May 24, 2019, and that he does not oppose this Motion.

/s/ Armando P. Duran
Armando P. Duran

CERTIFICATE OF SERVICE

I, the undersigned Counsel, hereby certify that on this 24th day of April, 2019, I have forwarded a copy of the foregoing document to Plaintiffs' Counsel and to all Counsel of record, as prescribed by law.

/s/ Armando P. Duran
Armando P. Duran